

**UNITED STATES DISTRICT COURT
DISTRICT OF PENNSYLVANIA**

ADAM CRAWFORD, LUCIA DEPRETTO and :
MEGAN WAIER BENNETT, Individually and : CIVIL ACTION NO.: 2:20-cv-3317
on behalf of the CDI CORPORATION 401(k) :
Plan, :
:
:
Plaintiffs, :
:
:
v. :
:
:
CDI CORPORATION, BOARD OF :
DIRECTORS OF CDI CORPORATION, CDI :
CORPORATION 401(K) SAVINGS PLAN :
COMMITTEE and JOHN DOES 1-30, :
:
:
Defendants. :
:
:

**PLAINTIFF’S UNOPPOSED MOTION FOR AN ORDER:
PRELIMINARILY APPROVING CLASS ACTION SETTLEMENT; CERTIFYING
THE PROPOSED SETTLEMENT CLASS; APPOINTING CLASS COUNSEL;
APPROVING THE FORM AND MANNER OF CLASS NOTICE; APPOINTING A
SETTLEMENT ADMINISTRATOR; AND SCHEDULING A FINAL SETTLEMENT
HEARING AND HEARING ON PLAINTIFF’S INCENTIVE AWARD AND
ATTORNEY’S FEES AND EXPENSES**

Plaintiffs Adam Crawford, Lucia DePretto, and Megan Waier Bennett (collectively “Plaintiffs”), individually and on behalf of all others similarly situated, move this Court pursuant to Federal Rules of Civil Procedure 23, for an Order: (i) preliminarily approve the proposed Settlement, which provides on behalf of the Class the \$1.8 million Settlement Amount¹; (ii) certify the proposed Class for settlement purposes; (iii) establish a plan for providing notice of the Settlement to Class Members; (iv) appoint Class Counsel; (v) approve the Settling Parties’ selection of a Settlement Administrator; and (vi) set a hearing for consideration of final approval

¹ All capitalized terms used herein shall have the meaning ascribed to them in the Settlement Agreement dated June 7, 2021 (the “Settlement Agreement”) entered between Plaintiffs and Defendants.

of the Settlement and consideration of Lead Counsel's motion for a Case Contribution Award to Plaintiffs and an award of attorney's fees and reimbursement of litigation expenses.

With this motion, Plaintiffs submit copies of the fully executed Class Action Settlement Agreement (the "Settlement Agreement"). The following Exhibits are appended to the Settlement Agreement:

- Exhibit A, proposed Notice of Class Action Settlement
- Exhibit B, proposed Plan of Allocation
- Exhibit C, proposed Order Granting Preliminary Approval
- Exhibit D, proposed Final Approval Order
- Exhibit E, proposed Notice pursuant to the Class Action Fairness Act

As reflected in the Settlement Agreement, the parties want to compromise and settle all issues and claims relating to the allegations made in this action on behalf of all members of the proposed Classes. Plaintiffs' proposed plan of allocation will fairly and compensate Class Members in proportion to the relative losses resulting from Defendants alleged imprudent investment of their assets and other claims as described in the Complaint in this case, and taking into account Defendants' proffered defenses.

WHEREFORE, Plaintiffs respectfully request that the Court grant its Unopposed Motion and enter the proposed Order attached as Exhibit C hereto.

Respectfully submitted,

Dated: June 7, 2021

EDELSON LECHTZIN LLP

/s/ Eric Lechtzin

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Attorneys for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2021, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Eric Lechtzin
Eric Lechtzin